



April 23, 2013

Re: Structure and Practice of the Video Relay Service Program, CG Docket No. 10-51;
Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing
and Speech Disabilities, CG Docket No. 03-123

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Ms. Dortch:

Speed of Answer:

Rolka Loube Saltzer Associates, as the Administrator of the Interstate Telecommunications Relay Service Fund is providing supplemental information regarding the above referenced docket for the consideration of the Commission. The Commission sought comment in the 2011 VRS Reform FNPRM on whether to update its VRS “speed of answer” rules, which require VRS providers to answer 80 percent of all VRS calls within 120 seconds, measured on a monthly basis.^[1]

Please understand that the rules do not currently address such issues as whether or not internal, training or test calls are or can be counted, nor do they differentiate compensable from non-compensable calls, additionally the data we have received does not appear to be consistently reported amongst providers. RLSA updated the instructions distributed to certified service providers on January 7, 2013 which will be effective starting with reimbursement requests for the month of April 2013. Note that some providers also process non-VRS calls through the same equipment. It is conceivable that there are providers who use those calls to improve their reported SOA. RLSA asked service providers to respond to the following topics.

1. RLSA is considering supplementing the filing instructions for the CDR (“call detail record”) to report date/time stamps in GMT format. Please comment if such a change would be difficult for your company to implement in relation to the services that are reporting CDR data.
2. Since the daylight savings time switch occurred (in most but not all areas) in March, we request that TTY, STS, CTS, IP CTS, IP Relay and VRS providers explain how the

^[1] 2011 VRS Reform FNPRM, 26 FCC Rcd at 17405, ¶ 87. See also *id.* at 17401, 17403, 17405, ¶¶ 77, 83, 86; [old 47 C.F.R. § 64.604(b)(2)(iii).]

provider's systems are accounting for the time change, especially as it relates to calls that start before the time change but which extend to a time after the change, in order to indicate the actual duration of such calls, so that the calls do not appear to be an hour longer than they actually were, or appear to end earlier than the call started.

There is no guidance or rule that defines when the day starts or ends for SOA measurements. For example, does the month (or day) start at midnight EST, EDST, MST, MDST, PST, PDST, est. and end at 11:59:59 on the last day of the month, measured in the same time zone? What if the time changed during the month? Currently, a simultaneous call reported by AT&T in GMT would be reported with a very different timestamp by Sorenson who is currently reporting in PST or PDST. AT&T's reporting day starts 8 hours earlier than Purple's, 6 hours earlier than CAAG and 9 hours earlier than Sorenson, in the winter and 7, 5, and 8 hours earlier in the spring, summer and fall, respectively.

In order to report SOA, a provider currently decides when their day/month starts and when it ends. They determine which date to allocate each call to, possibly based on the handoff time but it might be based on the session time, incoming call termination time or some other timestamp. There are no rules that address whether test, training and calls generated by employees or non-VRS subcontractors are excluded from the tally of answered and unanswered calls. Since RLSA will be calculating the SOA rather than relying on the provider's perspective on what the daily or monthly SOA is, RLSA requests guidance on how to measure SOA. Can the measurement vary from one provider to another? How should calls that span the transition from one day to the next and one month to the next be reported for purposes of calculating the SOA?

The way SOA is measured and reported should be clarified before the standard is changed. Accurate data to support an adjustment to the length of the benchmark is not available due to the providers reporting only how many calls are answered in the required time, not how long callers actually waited for a CA.

Following is the monthly 2012 average aggregated Speed of Answer data as reported to the TRS Fund Administrator.

Jan-12	99.53%
Feb-12	99.71%
Mar-12	99.67%
Apr-12	99.67%
May-12	99.64%
Jun-12	99.64%
Jul-12	99.70%
Aug-12	99.64%
Sep-12	99.67%
Oct-12	99.70%
Nov-12	99.57%
Dec-12	98.22%

Outreach, Research and Development:

RLSA previously identified the cost, in cents per minute, that have been reported by VRS service providers included in the VRS rate tier reimbursement rates that are attributable to outreach, research and development. That information is provided below:

	2010	2011	2012
Research & Development	\$4,818,983	\$5,649,903	\$7,046,521
Outreach	\$27,187,640	\$27,193,744	\$26,243,538

1. Note: Industry cost data are supplied on a calendar basis, not on a tariff, or fund year basis.
2. Industry actual totals are reported as the sum of the providers who filed in 2012 for the years 2010 and 2011, and as the sum of the providers who filed in 2013 for the year 2012.

Sincerely,



David Rolka, President

cc: A.M.